

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JOHNNY M. HUNT,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 3:23-cv-00243
)	
SOUTHERN BAPTIST CONVENTION;)	Judge Campbell
GUIDEPOST SOLUTIONS LLC; and)	Magistrate Judge Frensey
EXECUTIVE COMMITTEE OF THE)	Jury Demand
SOUTHERN BAPTIST CONVENTION,)	
)	
Defendants.)	

**RESPONSE IN OPPOSITION TO GUIDEPOST SOLUTIONS LLC’S
MOTION FOR A PROTECTIVE ORDER**

Pursuant to Rule 7.01 of the Local Rules of Court, Plaintiff Johnny M. Hunt, by and through the undersigned counsel, hereby respectfully submits his Response in Opposition to the Motion for a Protective Order filed by Defendant Guidepost Solutions LLC (Doc. No. 133).

As the previously discussed date of February 26, 2024, for Plaintiff’s deposition of Guidepost Solutions LLC (“Guidepost”) pursuant to Fed. R. Civ. P. 30(b)(6) has passed, Plaintiff respectfully submits that the instant motion is moot and should therefore be denied. Moreover, the Court should deny Guidepost’s request for costs and fees pursuant to Rule 26(c)(3) and Rule 37(a)(5) because the circumstances of this case would make an award of expenses unjust. Guidepost has repeatedly refused to comply with its discovery obligations in this litigation and has stalled the progression of this litigation for months. In further support of why the circumstances of this case would make an award of costs and fees unjust, Plaintiff hereby incorporates by reference his arguments regarding the Rule 30(b)(6) deposition of Guidepost as

set out in his Memorandum in Support of Plaintiff's Third Motion to Compel Defendants' Compliance With Deposition Notices. (Doc. No. 131, pp. 1-3).

For the foregoing reasons, Guidepost's Motion for a Protective Order should be denied as moot, and Guidepost's request for costs and fees pursuant to Rule 26(c)(3) and Rule 37(a)(5) should be denied.

Dated: March 7, 2024

Respectfully submitted,

s/ Andrew Goldstein

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Response in Opposition to Guidepost Solutions LLC's Motion for a Protective Order to be electronically filed with the Clerk of the Court on March 7, 2024, using the CM/ECF system, which will automatically serve all counsel of record listed below:

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